

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re: ANTHONY S. BRUTTANITI, Debtor, SPECIALIZED LOAN SERVICING, LLC, AS SERVICING AGENT FOR CREDIT SUISSE FIRST BOSTON MORTGAGE SECURITIES CORP., HOME EQUITY ASSET TRUST 2006-3, HOME EQUITY PASS-THROUGH CERTIFICATES, SERIES 2006-3, U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE, Movant, ANTHONY S. BRUTTANITI and WILLIAM C. MILLER, Trustee, Respondents.	Bankruptcy No. 19-17707-mdc Chapter 13 Document No. 28, 31
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CERTIFICATION OF DEFAULT OF STIPULATION
RESOLVING MOTION FOR RELIEF FROM THE AUTOMATIC STAY

AND NOW, comes Movant, Specialized Loan Servicing, LLC, as Servicing Agent for Credit Suisse First Boston Mortgage Securities Corp., Home Equity Asset Trust 2006-3, Home Equity Pass-Through Certificates, Series 2006-3, U.S. Bank National Association, as Trustee (“Movant”), filed a Stipulation Resolving Motion for Relief from the Automatic Stay (the “Stipulation”) in the above captioned case on July 14, 2020, at Document No. 28. The Stipulation was approved by this Court on July 31, 2020, by the Order docketed at Document No. 31. A true and correct copy of the Stipulation is attached hereto as **Exhibit A**.

1. Paragraph 4 of the Stipulation states:

Debtor will cure the remaining post-petition arrears by making monthly payments to Movant in the amount of \$8,420.16 through an Amended

Chapter 13 Plan to be filed by Debtor. In order to resolving the pending the Motion, the parties agree as follows:

- a) Debtor shall have an Amended Chapter 13 Plan to provide for the \$8,420.16 in post-petition arrears.
- b) The terms of this Stipulation shall be incorporated into the Debtor's confirmed Amended Chapter 13 plan and any subsequent plan filed thereafter.
- c) Specialized Loan Servicing, LLC, as Servicing Agent for Credit Suisse First Boston Mortgage Securities Corp., Home Equity Asset Trust 2006-3, Home Equity Pass-Through Certificates, Series 2006-3, U.S. Bank National Association, as Trustee shall be paid inside the Debtor's Chapter 13 Plan.
- d) Any conversion or dismissal of this case shall void the terms of the stipulated order.

Specialized Loan Servicing, LLC
P.O. Box 636007
Littleton, CO 80163

2. On or about October 31, 2020 a Notice of Address Change was filed by the Movant, showing the Payment address changed to Specialized Loan Servicing, LLC, 6200 S. Quebec Street, Greenwood Village, CO 80111.

3. The last payment made to the Movant was made on November 11, 2020. Debtor is in delinquent in the amount of \$4,767.26 as of February 10, 2021. A payment history is attached, hereto as **Exhibit B**.

4. Movant notified Debtor and Debtor's counsel of the default by letter dated January 27, 2021. The Notice of Default and Intent to File Certification of Default letter is attached hereto as **Exhibit C**.

5. Movant is entitled to relief from the automatic stay without further hearings because Debtor has failed to comply with the terms of the Stipulation. Debtor has been adequately notified of the default.

WHEREFORE, Movant, Specialized Loan Servicing, LLC, as Servicing Agent for Credit Suisse First Boston Mortgage Securities Corp., Home Equity Asset Trust 2006-3, Home Equity Pass-Through Certificates, Series 2006-3, U.S. Bank National Association, as Trustee requests that this Honorable Court enters the attached Order granting Movant relief from the automatic stay in the property located at 1432 S. Broad Street, Philadelphia, PA, 19146.

Dated: February 15, 2021

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

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